UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD)(SN)

ECF Case

This document relates to:

Chang Don Kim et al. v. Islamic Republic of Iran, No. 1:18-cv-11870 (GBD) (SN)

NOTICE OF MOTION

PLEASE TAKE NOTICE that Plaintiffs in the above-referenced matter, by undersigned counsel and in accordance with F.R.C.P. 15, respectfully request that this Court grant Plaintiffs' Motion for Leave to Amend to Correct Errors. No adverse parties have appeared in this proceeding, and the Clerk issued a Certificate of Default on August 13, 2019.

In support of this motion, Plaintiffs submit the following memorandum of law and a proposed order.

Dated: August 20, 2019

/s/ Jerry S. Goldman

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